

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

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|---|---|-----------------------------|
| CLEVELAND COMMUNICATIONS, INC., |) | CASE NO. 1:23-cv-1561 |
| |) | |
| |) | JUDGE CHARLES ESQUE FLEMING |
| Plaintiff, |) | |
| vs. |) | |
| |) | |
| LORAIN COUNTY BOARD OF COMMISSIONERS, <i>ET AL.</i> , |) | |
| |) | |
| |) | |
| Defendants. |) | |

MOTION FOR LEAVE TO FILE
MOTION TO CONDUCT LIMITED PRE-CONFERENCE DISCOVERY OF
DEFENDANT JEFFREY ARMBRUSTER
UNDER SEAL

NOW COMES, Plaintiff Cleveland Communications, Inc., by and through the undersigned counsel, and hereby moves for leave to file its Motion to Conduct Limited Pre-Conference Discovery on Defendant Jeffrey Armbruster (the “Motion”) under seal pursuant to Local Rule 5.2. The Motion references and relies on sensitive personal health information related to Defendant Armbruster.

Respectfully submitted,

/s/ Allen T. Carter

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 23, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Allen T. Carter
One of the Attorneys for Plaintiff